

1 talking about or in regards to?

2 Q. In your complaint, I think it's Paragraph
3 101, you allege that Scruggs and Gomez violated your
4 Citizens Participation Act by using legal actions and
5 threats of action to silence your criticism of them and
6 prevent them seeking to address under the First
7 Amendment; do you recall that?

8 A. Not verbatim but it's something I would say.

9 Q. Yeah. And so you think it's an illegal
10 violation they use legal actions, correct?

11 A. I think to block somebody's First Amendment
12 right is illegal and to use legal to go after somebody
13 for the First Amendments rights is illegal and that is
14 why both of their cease and desists never went anywhere
15 and I was still talking because they're not going to
16 silence me.

17 Q. You're aware that the federal court issued an
18 admonition about pretrial publicity in this case, aren't
19 you?

20 A. Nope.

21 Q. I'm sorry? You're not?

22 A. I don't know what you're talking about.
23 Sorry.

24 Q. All right. You don't know that the federal
25 court instructed that you should not be publicizing your

1 version of the facts in this case to possible jury
2 members?

3 A. No. What they told me was I'm not allowed --
4 what I was told was not allowed to make Facebook memes
5 about the City is what I recall, or memes about the City
6 and I was allowed to talk about stuff that happened
7 prior but nothing that's happening now.

8 Q. All right. So anything else after your suit
9 was filed but before the course of admonition you can
10 talk about on social media, correct?

11 A. That's correct.

12 Q. And you think there are people on social
13 media that are in the area of a jury pool for the court
14 in Corpus Christi?

15 A. I think there's people on Facebook that are
16 on -- that could potentially be on the jury?

17 Q. Yes, sir.

18 A. Sure.

19 Q. But you continue to talk about the facts
20 before the suit was filed, correct?

21 A. Yeah, the facts. That's keyword. Good job.
22 Yes, sir, I agree.

23 Q. Okay. And it's your rendition of the facts
24 that you're publicizing, correct?

25 A. That's correct. I don't ever publicize